



# DAAS Policy on Violence-Free Work Environment

DAAS is opposed to all forms of workplace violence, including gender-based violence, physical assault, and weapons possession, and is committed to reducing the risk of violence in its programs and activities. All DAAS contractors, subcontractors, subrecipients and their employees must comply with DAAS Policy on violence free workplace.

This policy applies to all DAAS staff worldwide, and to Contractors, Subcontracts Personnel, Suppliers and Supplier Personnel to the extent set out below.

## DEFINITIONS:

1. **Complainant** – A person or party who makes a complaint under this policy.
2. **DAAS Personnel** – DAAS employees, officers, members of the Board of Directors, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of DAAS.
3. **Gender-based Violence** – Violence that is directed at an individual based on their biological sex, gender identity, or perceived adherence to socially defined norms of masculinity and femininity. It includes physical, sexual, and psychological abuse; threats; coercion; arbitrary deprivation of liberty; and economic deprivation - whether occurring in public or private life.
4. **Premises** – Company-owned or leased buildings and surrounding areas such as sidewalks and parking lots; company-owned or leased vehicles; and private vehicles brought onto company premises or used to conduct company business.
5. **Program participant** – Any adult or child who is served by an DAAS program or has contact with DAAS Personnel, Suppliers, or Supplier Personnel in connection with or as a result of DAAS's programs or business activities.

6. **Respondent** – A person or party against whom the complaint is made under this policy.

7. **Supervisor** – An employee of DAAS who is in a direct supervisory role over the work of one or more employees of DAAS.

8. **Supplier** – Any DAAS contractor, consultant, vendor, service provider, subcontractor, or subrecipient.

9. **Supplier Personnel** – A Supplier's employees, interns, and fellows (paid or unpaid) volunteers, agents, and other individuals authorized to act on a Supplier's behalf.

10. **Survivor or victim/survivor** – An individual who is currently subject to, or has in the past been subjected to, domestic or sexual violence, dating violence, stalking or other forms of violence.

11. **Weapons** – Includes all firearms, whether or not the employee has a license or concealed-carry permit, as well as large knives, brass knuckles, clubs, explosives and other items unnecessary for work and which can be reasonably used to harm people. This is not an exhaustive list and other items may constitute as prohibited weapons under this policy.

## **POLICY:**

### **1. General Statement of Policy**

1.1 DAAS prohibits, and will not tolerate, any form of violence or threats of violence in the work environment, by or against any DAAS Personnel while on company premises, at company-sponsored events, or while engaged in the performance of employment duties for DAAS, whether on or off company premises.

1.1.1 This includes work locations such as, but not limited to, DAAS offices, Supplier or funder offices or facilities, during business travel, compound housing, on work field visits, deployment to humanitarian zones, and in all work interactions in the communities in which we serve. It includes on-site and off-site training workshop events, and conferences, and work-related social events such as office parties, off-site business lunches and dinners, and client or professional group entertainment events.

1.2 DAAS Personnel must also not perpetrate any form of violence or threats of violence against Supplier Personnel, Program Participants, or anyone else with whom they interact in work-related situations.

1.3 Likewise, DAAS is committed to protecting DAAS Personnel from violence, whether by other DAAS Personnel (including supervisors, direct reports, and co-workers) or people outside DAAS, such as Supplier Personnel; employees of a Supplier's contractor, vendor, subcontractor, or subrecipient; employees of a funder; Program Participants; members of the communities DAAS serves; or anyone else they interact with in work related situations.

1.4 DAAS strictly prohibits all DAAS Personnel (other than those authorized by the company to carry weapons as part of their job duties) and visitors from possessing weapons of any kind while on company premises, at company-sponsored events, or while engaged in the performance of employment duties for DAAS, whether on or off company premises.

1.5 DAAS will follow its Employee Discipline Policy (DAAS HR Manual) (up to and including immediate separation from employment) for any employee found to have violated this policy.

1.6 DAAS maintains a corporate security policy and country specific security manuals specific to the local risks, including an Emergency Management Team that responds to group-scale threats of violence and safety of DAAS staff.

## 2. Conduct Constituting Violence

2.1 Prohibited acts or threats of violence may include, but are not limited to, the following:

2.1.1 fighting

2.1.2 striking another person

2.1.3 throwing objects at another person

2.1.4 injuring another person physically or causing emotional distress to others

2.1.5 discussing violence that employee perpetrates outside of the office

2.1.6 engaging in behavior that produces reasonable fear of injury in another person

2.1.7 damaging property intentionally

2.1.8 gender-based violence and sexual violence, including up to attempted or completed rape

2.1.9 threatening to injure an individual or damage property, whether verbally, in writing, or through use of threatening body language or gestures.

2.2 This list is not exhaustive, and there are other acts that may constitute work environment violence that violates this policy.

2.3 DAAS Personnel can be affected by violence and report it under this policy even if the conduct is directed at another individual.

### 3. Reporting

3.1 DAAS Personnel who experience or become aware of any imminent risk to the safety of DAAS Employees or others should immediately contact law enforcement.

3.2 DAAS Personnel who have been subject to any actual, threatened, or suspected violence, retaliation, or any other conduct prohibited by this policy, or who witness any such conduct, must report the conduct, within 24 hours, either orally or in writing, by contacting one of the following:

3.2.1 Their immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department;

3.2.2 Their local Human Resources (HR) representative or regional or departmental HR Partner;

3.2.3 The General Counsel on DAAS Board [hrlegal@daasus.com](mailto:hrlegal@daasus.com) or [daasuscompliance@outlook.com](mailto:daasuscompliance@outlook.com)

3.2.4 The Office of Compliance and Internal Audit (OCIA) via email at [daasuscompliance@outlook.com](mailto:daasuscompliance@outlook.com)

3.2.5 OCIA's reporting website either with your name or anonymously (<https://www.daasus.com/compliance-office>).

3.2.6.1 Anonymous reports are generally more difficult to investigate due to limited information. DAAS Personnel are urged to provide as much detailed information as possible about the

conduct, including, if possible, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of immediate harm.

3.3 DAAS Personnel who are supervisors or hold a position at director level or above are required to promptly, within 24 hours, notify HR of any actual or suspected violence, retaliation, or other violation of this policy that is reported to them, or that they observe or otherwise become aware of. Failure to do so is a violation of this policy and could lead to disciplinary action, up to and including immediate separation of employment.

#### **4. Support for Complainant**

4.1 The safety of all those involved is paramount. DAAS and the persons involved in implementing this policy will take all reasonable steps to ensure that responding to allegations of violence does not jeopardize the safety of the Complainant or Respondent. Upon receipt of a complaint, DAAS will make an immediate assessment concerning the health and safety of the individuals involved and implement temporary remedies necessary for safety. During investigations, DAAS will take actions necessary to ensure the safety of Complainants.

4.2 DAAS Personnel may use company benefit programs such as medical coverage, available paid or unpaid leave, and Employee Assistance Programs for support, subject to eligibility requirements and benefit plan terms.

#### **5. Non-Retaliation**

5.1 DAAS has a separate policy prohibiting retaliation Open Door and Non-Retaliation POL 201909120003). DAAS strictly prohibits any retaliation against DAAS Personnel who complain about violence or other violations of this policy or related procedures, or who participate in a violence investigation.

5.2 Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be violence or any other violation of this policy, assisting others in reporting violence or policy violations, or participating in investigations under this policy.

5.3 Suspected retaliation should be promptly reported via the reporting mechanisms in section

3. 5.4 DAAS Personnel who engage in retaliation will be subject to disciplinary action up to and including separation of employment or other relationship with DAAS.

## 6. Investigation and Corrective Action

6.1 Upon receipt of a report of violence, retaliation, or other violation of this policy, regardless of when the event(s) occurred, HR determines an appropriate course of action based on the nature of the situation.

6.2 DAAS will make an immediate assessment concerning the health and safety of the individuals involved, take steps to prevent further violence and implement temporary remedies which may include separating the Complainant from the Respondent, placing the Respondent or the Complainant (at their request) on administrative leave, or other measures at DAAS's discretion to ensure safety, confidentiality of the investigation, or allow for a thorough and uninterrupted investigation.

6.3 DAAS will conduct a sensitive, timely, and thorough investigation in an impartial manner that provides all parties with appropriate due process and maintains confidentiality to the extent possible (see section 8 below for detailed information about confidentiality).

6.4 Investigations will generally be conducted by the HR department, but DAAS may hire outside investigators when deemed appropriate.

6.5 DAAS Personnel must cooperate fully with investigations and provide truthful information to investigators.

6.6 Investigations typically involve interviews of Complainant and Respondent and others who may have witnessed or otherwise have knowledge of the complaint. A review of relevant records, e-mails, communications and other facts will be completed. Specific investigation steps will vary based upon the unique circumstances of each complaint.

6.7 Upon completion of the investigation, DAAS will review the evidence collected and determine whether violence, retaliation, or other violations of this or other DAAS policies have occurred.

6.8 Where a policy violation has occurred, DAAS will take prompt corrective action reasonably calculated to end the prohibited conduct and to deter future violence. Corrective action may range from coaching and counseling,

performance improvement plans, warnings, transfers, reassignments, demotions, suspensions, or other disciplinary action up to and including immediate separation of employment.

6.9 In addition to taking disciplinary action against FHI Personnel found to have violated this policy, DAAS also reserves the right to contact law enforcement where appropriate, and to seek any available court restraining order against any individual in order to prevent violence in the work environment.

6.10 DAAS will cooperate with law enforcement or other regulatory investigations and where appropriate will report credible allegations and violations to law enforcement and/or relevant funders. Such cooperation and reporting will be made under the guidance of the headquarters HR department and OCIA and may include consultation with the Office of General Counsel.

## 7. Violence Outside the Work Environment

7.1 For DAAS Personnel experiencing domestic violence or dating violence outside of the official work environment, DAAS will work with them to ensure they can access available leave, counseling, and medical care for themselves and/or their children, subject to eligibility requirements and benefit plan terms.

7.2 DAAS Personnel seeking an order of protection or restraining order as part of their efforts to become safe are encouraged to disclose the existence of a protection or restraining order to DAAS and the company will wherever possible, assist them as per the terms of their order that may relate to the DAAS workplace.

7.2.1 If applicable, DAAS may assist the employee to gather documentation from the workplace, such as emails or voice messages, that could support the employee's efforts in the justice system or otherwise to obtain or maintain safety from the subject of an abuse or harassment allegation.

7.3 DAAS recognizes that DAAS Personnel who are victims/survivors of violence may need time off to obtain legal, medical, or other support to help ensure their health, safety, or welfare or that of their child. DAAS will work in collaboration with the employee to provide reasonable and flexible leave options using available paid leave and other available benefits before requiring an employee to utilize unpaid leave. DAAS will take all reasonable measures to maintain the

confidentiality of a person who requests leave under this policy, to the extent allowed by law.

## 8. Confidentiality

8.1 DAAS shall take all reasonable measures to maintain the confidentiality of disclosures by DAAS Personnel regarding violence to the extent allowed by law and unless doing so could risk physical harm to any person and/or jeopardize safety within the workplace.

8.2 If DAAS Personnel choose to disclose the existence of a protection or restraining order to DAAS, DAAS shall store the order in a confidential personnel or other file.

8.3 Information learned through the investigation process will be disclosed only to those DAAS Personnel or other persons who “need to know” in order for DAAS to fulfill its obligations to investigate and take prompt action.

8.4 As required by local law, DAAS will provide necessary and appropriate disclosure to local enforcement agencies and will participate in investigations.

8.5 Nothing in this policy is intended as a guarantee of absolute confidentiality, nor is it intended to curtail employee rights under any applicable laws to discuss work-related matters.

## 9. Other Conduct That Violates This Policy

9.1 In addition to violence, retaliation, and other prohibited conduct outlined above, it is also a violation of this policy for DAAS Personnel to:

9.1.1 attempt to discourage, interfere, or impede any individual from reporting harassment

9.1.2 discourage or impede any individual’s participation in any investigation under this policy

9.1.3 knowingly provide false information or make false claims to investigators

9.1.3.1 This policy recognizes that the fact a claim cannot be substantiated does not necessarily make it a false claim.

## 10. Expectations of Suppliers and Supplier Personnel



10.1 Suppliers and Supplier Personnel must refrain from perpetrating violence as outlined in this policy.

10.2 DAAS requires that Suppliers similarly uphold the principles of this policy to prevent violence by and against Supplier Personnel. Failure to do so may result in termination of Supplier's contractual relationship with DAAS. 10.3 DAAS requires that Suppliers and Supplier Personnel cooperate fully with investigations of policy violations and provide truthful information to investigators.

## 11. Consequences of Policy Violations

11.1 DAAS Personnel who violate this policy are subject to disciplinary action (see Employee Discipline Policy - POL 03011) up to and including immediate termination of employment or other relationship with DAAS. (See 6.8 above.)

11.2 Program Participants who violate this policy may be removed from DAAS programs and barred from participation on other DAAS programs.

11.3 Violations of this policy by Suppliers or Supplier Personnel, may result in DAAS terminating the Supplier's contract with DAAS. Further, DAAS may pursue any contractual or other legal or equitable remedies that may be available. For policy interpretation or questions, please contact an HR Partner.

POLICY REVISION HISTORY:

<b>Policy #</b>	<b>Date Reviewed (YYYY MM DD)</b>	<b>Summary of Changes</b>	<b>Changed by Whom</b>
201909140007	2019/09/14	New Policy	Walter Phillips

